



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
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NOV 16 1995

Mr. Thomas Ames
BRAC Environmental Coordinator
Naval Air Warfare Center
Aircraft Division
P.O. Box 5152
Warminster, PA 18974-0591

Re: Naval Air Warfare Center (NAWC), PA

Dear Mr. Ames:

Thank you for meeting with EPA and the BRAC Cleanup Team on November 15 to discuss major deviations by the Navy from the "Area A Trench Excavation and Contingency and Sampling Plan" ("the Plan") dated September 28, 1995. As you are aware, the Plan identifies contingency measures which should be followed "to prevent the mobilization of NAPLs (Non-Aqueous Phase Liquids) during excavation activities" associated with the installation of a groundwater transfer line through Area A. This Plan was jointly developed and agreed to by the Navy and EPA to help prevent additional groundwater contamination by the Navy at NAWC.

To prevent the mobilization of NAPLs and resultant, potential impacts on groundwater quality, the Plan requires that any excavated soils with organic vapor readings over 60 ppm be screened for NAPLs and that excavation work should stop immediately if organic vapor readings of 100 ppm or greater are detected during the screening of excavated soils. After excavation work is stopped, the Plan requires that the Navy (Ensign Paula Michaud or designated OICC representative) be notified and provides that a Navy representative will then determine a course of action. During meetings of the BRAC Cleanup Team, EPA has requested to be consulted should such a course of action need to be determined.

During our meeting, the Navy confirmed that, on November 13 and 14, while excavating soil for the purpose of installing the groundwater transfer line through a portion of Area A suspected of containing NAPLs, organic vapor readings of **350 ppm** and **380 ppm** were detected at two separate locations. According to the findings of the subject meeting, in each case, the subject soils were not screened for NAPLs, the excavation work did not stop, and the Navy representative was not notified by the Navy contractor(s) performing the work until after the excavation had continued through soil likely to be contaminated with NAPLs into underlying soils.

By not following these critical elements of the Plan, the Navy may have mobilized NAPLs in a manner which could exacerbate existing NAPL-related groundwater contamination attributable to NAWC or may produce a new plume of NAPL-related contaminated groundwater. As you are aware, complete remediation of NAPL-related groundwater contamination is not feasible with current technology and pumping and treatment measures to limit NAPL-related groundwater contaminant migration are very costly.

During the meeting, as the BRAC Environmental Coordinator, you sought assurances from the contractor performing the work that similar deviations from critical elements of the Plan do not happen in the future. Unfortunately, despite apparently being invited, NORTHDIV personnel responsible for managing this contractor were not present at the meeting. (This absence is consistent with my observations over the last year, which have found that the vast majority of the subject contractor's fieldwork has not been overseen by a Navy representative.) As a result, while the Navy contractor apparently made a commitment to follow the Plan in the future, it is unknown whether Navy contractor management personnel will assure that this commitment is met.

As discussed, the subject deviations from the Plan and the resultant, likely mobilization of NAPLs may have affected the quality of groundwater resources. In response, the Navy should assess the nature and extent of any such groundwater impacts through additional CERCLA Remedial Investigation work. The scope of this additional work should be included on the agenda of a meeting of the Technical Subcommittee of the Restoration Advisory Board on December 5, 1995.

Finally, as discussed, EPA assumes that the Navy will consult with EPA if excavation work is stopped in the future due to the detection of potential NAPLs and a course of action needs to be determined. Please let me know if you have any questions or comments regarding the above.

Sincerely,



Darius Ostrauskas
Remedial Project Manager

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